

Code of Conduct

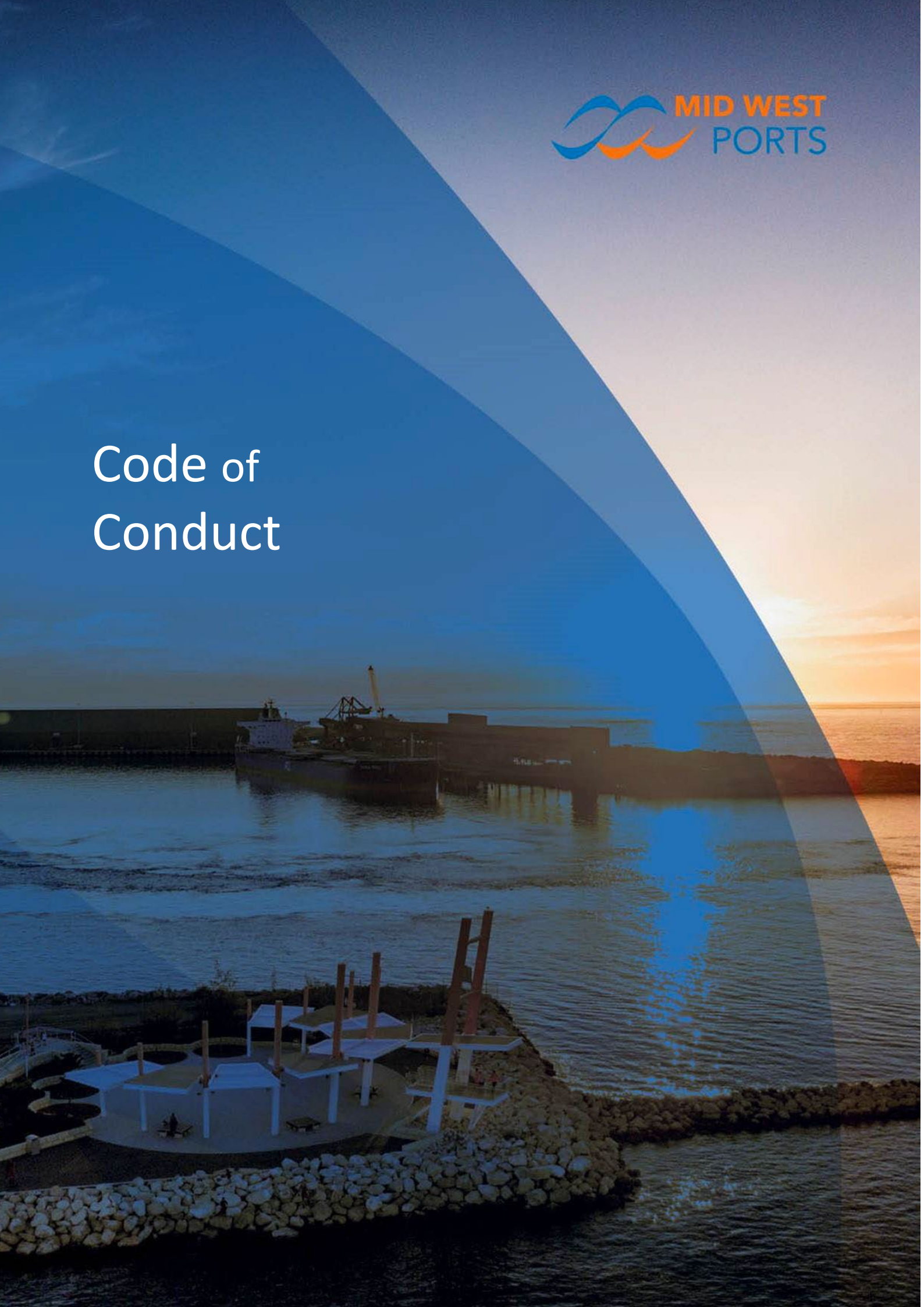


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1 A Message from the Chair

At Mid West Ports Authority (MWPA) we play a vital role connecting regional Western Australia to the world. We provide essential port services that support local businesses, trade and tourism - and we do so with a commitment to safety, integrity and our community.

Ethical behaviour is core to who we are. This Code explains what that means in practice: how we treat each other, how we make decisions and how we represent Mid West Ports Authority in everything we do.

I expect every director, employee and contractor to read it, understand it and live by it - and to speak up if something doesn't seem right.



Noel Hart
Chair, Mid West Ports Authority Board

2 Our Vision, Purpose and Values

Vision — To be bold supply chain enablers for the long-term future of regional Western Australia.

Purpose — To provide a sustainable gateway for trade and tourism.

Accountability	We deliver our best and hold ourselves accountable for results.
Caring	We care about our colleagues, our community, our environment and each other's safety.
Courage	We have the courage to move forward, innovate, learn and grow.
Collaboration	We bring the right people together to get the best result.
Integrity	We are consistently transparent, honest, ethical and genuine.

Mid West Ports Authority is a Government Trading Enterprise established under the *Port Authorities Act 1999*. Our decisions must always reflect our obligations as a public authority and the trust placed in us by government and the community.

3 About This Code

This Code is established under section 21 of the *Port Authorities Act 1999* and sets out the minimum standards of conduct and integrity expected of everyone at MWPA. It is based on the four mandatory standards in the *Public Sector Management Act 1994*: **Integrity, Impartiality, Respect for Others** and **Trust and Accountability**.

The Code can't cover every situation, but it guides good decision-making and sets the standard we hold ourselves to. Related policies and procedures provide the detail - when the Code refers you to a policy, follow it.

3.1.1 Who it applies to

The Code applies to all directors, employees (including trainees and temporary staff), contractors, consultants and volunteers. It applies whenever you are representing MWPA - at work, on site, remotely, outside standard hours when performing work duties and online. Contractors are expected to comply, and this is built into our contracts.

3.1.2 Our responsibilities

Everyone is responsible for understanding and following this Code and all relevant MWPA policies, demonstrating our values through actions and decisions, and speaking up when something doesn't seem right.

Managers and leaders are additionally responsible for ensuring their teams understand and live the Code, leading by example, protecting anyone who raises a concern, and identifying and managing misconduct risks.

3.1.3 Questions about the Code

Speak with your line manager, a senior manager or your relevant Executive Manager. You can also find related policies in the Document Centre or contact the Human Resources team.

4 Standard 1: Integrity

We act honestly, transparently and ethically in everything we do. We take responsibility for our conduct, earn the trust placed in us by the community and uphold the highest standards of professionalism.

4.1.1 Honesty and accountability

We are truthful in our communication, transparent in our decisions and consistent in doing what's right - even when it's difficult or no one is watching. We never mislead or act in a way that could harm the organisation. We separate personal views from professional responsibilities and deliver advice that is accurate, impartial and evidence-based.

4.1.2 Delegated authority

We understand and act within the limits of the authority delegated to our position. We do not make decisions or commit MWPA resources beyond our delegation. If you are unsure of your delegation, check the Corporate Delegations Manual before acting.

4.1.3 Fitness for work

We attend work fit and ready to perform our duties safely. We must not be impaired by alcohol, drugs (including prescription medication that affects performance) or any other substance while at work or representing MWPA. We comply with MWPA's *Fitness For Duty* Procedure at all times.

4.1.4 Fraud and corruption

We have zero tolerance for fraud and corruption. Fraud includes any dishonest act intended to result in financial or other gain - such as theft, false claims, falsifying records or misuse of assets. Corruption includes dishonest or partial conduct by a public officer, including bribery, abuse of position, or misuse of information.

We prevent fraud and corruption by acting with integrity, following procurement and financial procedures, declaring conflicts of interest and reporting concerns immediately.

4.1.5 Use of ICT

MWPA's ICT systems, including computers, email, internet and mobile devices, are provided for work purposes. We use them responsibly and in accordance with MWPA's *ICT Acceptable Use Policy*. This means we only access systems and information we are authorised to use, protect passwords and devices, and report suspected cyber incidents or data breaches immediately

Inappropriate use of ICT is misconduct.

4.1.6 Communications and social media

Our communications - verbal, written or digital - must be professional, accurate and appropriate. Only authorised persons may speak or act on behalf of MWPA or communicate with media and key stakeholders. All media enquiries are referred to our Corporate Affairs team.

When using social media personally, we must not imply MWPA endorses our views, disclose confidential information or bring MWPA into disrepute.

5 Standard 2: Impartiality

We put the public interest first. Our decisions are based on merit, fact, and sound judgement — not personal views, relationships or outside influence.

5.1.1 Merit-based decisions

We make decisions fairly and consistently using facts and sound reasoning - not personal preferences or external pressure. Whether it's hiring, procurement or operational decisions -our choices must be merit-based and clearly justifiable.

5.1.2 Conflicts of interest

Conflicts of interest (real, perceived or potential) must be disclosed as soon as they arise and managed in accordance with MWPA's *Conflicts of Interest Procedure*. We actively manage our personal interests to ensure they do not improperly influence our work.

5.1.3 Gifts, benefits and hospitality

At MWPA, a sincere thank you is enough. We do not seek gifts, benefits or hospitality, and cash gifts are never acceptable under any circumstances.

Where gifts, hospitality or other benefits are offered, whether accepted or declined, they must be declared on a Gift and Hospitality Declaration Form within 48 hours if valued at \$50 or above. Declarations require approval from your line manager and the CEO before being forwarded to Human Resources for recording. If approval is refused, the gift must be returned.

5.1.4 Bribes

We never offer, request or accept bribes under any circumstances. Bribes can take many forms - money, gifts, favours or special treatment. If you suspect bribery, report it immediately.

5.1.5 Secondary employment

We obtain approval before undertaking any work outside MWPA and comply with the *Secondary Employment Procedure*.

6 Standard 3: Respect for Others

We are committed to a workplace that is safe, inclusive and welcoming for all. We treat everyone with dignity and fairness, and we genuinely value diversity.

6.1.1 Respectful communication

We engage with courtesy, listen actively and respond thoughtfully - whether in person, by phone or online. We avoid language or behaviour that is aggressive, dismissive or inappropriate.

6.1.2 Diversity, equity, and inclusion

We respect and value the differences that make each of us unique - in culture, gender, age, ability, background, beliefs or lived experience. Discrimination or bias, whether deliberate or unconscious, has no place at MWPA. We actively promote equity and ensure all voices are heard.

6.1.3 Bullying, harassment, and discrimination

We do not tolerate bullying, harassment, or unlawful discrimination of any kind, including direct and indirect discrimination based on sex, gender, race, disability or any other protected attribute. If you see this behaviour, speak up.

6.1.4 Safe and collaborative culture

We work collaboratively, support one another and maintain professionalism when challenges arise. Everyone deserves to feel safe at work - physically, emotionally and psychologically. We take concerns seriously and protect those who raise them.

7 Standard 4: Trust and Accountability

We take responsibility for our actions and decisions. We build trust by being open, transparent, and reliable — with our teams and with the community we serve.

7.1.1 Use of resources

We are stewards of public assets and have a duty to use them efficiently, responsibly and sustainably. Resources include financial resources and corporate credit cards, equipment and ICT, office facilities, travel and our time at work. Time is a resource - unproductive personal activity during work hours affects our colleagues and our organisation. All use of resources is governed by MWPA's relevant policies and procedures.

7.1.2 Confidentiality, privacy, and information access

We handle all information with care and discretion. We only access, use or share information when authorised to do so.

Confidential information, including commercial, operational and personnel matters, must not be shared with anyone not authorised to receive it. Personal information must be handled in accordance with applicable privacy laws such as the *Privacy and Responsible Information Sharing Act 2025* and MWPA's privacy policies. Unauthorised disclosure is a serious breach of this Code and may have legal consequences.

If you become aware of an actual or suspected data breach, report it immediately.

7.1.3 Record keeping

We create and maintain accurate records in line with the *State Records Act 2000* and MWPA's Record Keeping Plan. We are aware that records may be subject to public access under the *Freedom of Information Act 1992*. Records must be clear, professional and properly stored. See MWPA's *Records Management Procedure* for guidance.

7.1.4 Procurement

All procurement activities must be managed with integrity, transparency and in accordance MWPA's procurement and contract management policies. When in doubt, contact the Procurement Team.

7.1.5 Managing risk

We use MWPA's *Risk Management Policy and Framework* to identify, assess, and manage risks - protecting our people, operations and stakeholder relationships.

7.1.6 Responsiveness

We deliver services with respect, courtesy and professionalism. We are clear, consistent and fair in our communications and actions with port users, community members and government partners.

8 When the Code Is Breached

Breaches of this Code can damage our culture, harm reputations and undermine trust. They may result in disciplinary action under MWPA's Discipline Procedure ranging from counselling to dismissal, and in some cases may constitute a criminal offence.

8.1.1 How to report a concern

If you see behaviour that doesn't align with this Code, speak up. You can report to your line manager, a senior manager, any Chief Officer, a designated PID Officer, or the Human Resources team.

8.1.2 External reporting options

Concern	Agency
Minor misconduct by a public officer	Public Sector Commission
Serious misconduct or corruption	Corruption and Crime Commission
Public interest disclosures	MWPA PID Officers - <i>Public Interest Disclosure Act 2003</i>
Discrimination or equal opportunity	Equal Opportunity Commission
Industrial or employment matters	Fair Work Commission
Workplace health and safety	WorkSafe

Speak with a PID Officer before making a formal public interest disclosure. For anonymous reporting, MWPA supports the Public Sector Commission's *Safe to Say* program.

8.1.3 Protection for those who speak up

MWPA is committed to protecting anyone who raises a concern in good faith. Reprisal or victimisation is strictly prohibited and is itself a breach of this Code. Additional protections apply under the *Public Interest Disclosure Act 2003* (WA) and the *Corruption, Crime and Misconduct Act 2003* (WA). If you are unsure whether you are protected, speak with your manager, Executive Officer or HR.

Reports must be made honestly. Deliberately false or misleading reports are a breach of this Code and may be unlawful.

9 Our Commitment

This Code reflects the standard of conduct MWPA expects of all Directors, employees and contractors. It embodies our values and the trust placed in us by government, industry and the community we serve. Adherence to this Code safeguards our people, our reputation and the long-term interests of the organisation.

Where conduct falls short of this standard, or where uncertainty arises, individuals are expected to seek guidance and raise concerns promptly.

Compliance with this Code is a condition of engagement with MWPA. It applies alongside all other MWPA policies and procedures, and takes precedence where any inconsistency arises with a lower-level document.

10 Associated Documents

- Corporate Delegations Manual
- Fitness For Duty Procedure
- Acceptable Use Policy
- Conflicts of Interest Procedure
- Gift and Hospitality Declaration Form
- Secondary Employment Procedure
- Record Keeping Plan
- Records Management Procedure
- Risk Management Policy and Framework
- Discipline Procedure

11 Administration

Document Custodian	Chief Executive Officer
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